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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 13-00814-JST
)	
Plaintiff,)	[AMENDED]
)	STIPULATED REQUEST TO CONTINUE
v.)	HEARING DATE TO MAY 30, 2014 AND
)	EXCLUDE TIME UNDER THE SPEEDY
)	TRIAL ACT; [PROPOSED] ORDER
IVORY BUGGS,)	
)	
Defendant.)	
)	
)	

The above-captioned matter is set on April 18, 2014 before the Hon. Jon S. Tigar for SETTING hearing. The parties jointly request and stipulate that the Court continue the matter to May 30, 2014 at 9:30 a.m. for CHANGE OF PLEA hearing. The parties also request that the matter be referred to the Probation Office for preparation of a Presentence Report, so that this continuance does not delay sentencing in the case. The parties agree and stipulate that the time until May 30, 2014 should be excluded, under 18 U.S.C. §3161(H)(7)(A) and (B) because the ends of justice served by the granting of the continuance outweigh the best interests of the public and the defendant in a speedy and public trial. The parties also agree that preparation of the Presentence Report and the Court's consideration of the proposed plea agreement provide independent grounds for exclusion of time.

1 The continuance is necessary because a plea agreement has been reached in this case and
2 the parties request the first available date for that hearing. The continuance will also allow the
3 parties to further conduct investigation in preparation for a contested sentencing and to assist in
4 the Presentence Investigation.

5
6 DATED: April 17, 2014

/s/

MANISH KUMAR
Special Assistant United States Attorney

8
9 DATED: April 17, 2014

/s/

JOHN PAUL REICHMUTH
Assistant Federal Public Defender
Counsel for IVORY BUGGS

11
12
13 **ORDER**

14 Based on the reasons provided in the stipulation of the parties above,

15 IT IS HEREBY ORDERED that the SETTING hearing in this case be continued to May
16 30, 2014 at 9:30 a.m. before the Hon. Jon S. Tigar for CHANGE OF PLEA HEARING. It is
17 further

18 ORDERED that this case be referred to the United States Probation Office for
19 preparation of a Presentence Report for an anticipated sentencing date approximately three
20 months from the date of this referral. The court finds that the ongoing research and
21 investigation of both counsel and the Probation Office, as well as the Court's consideration of
22 the plea agreement, justify an exclusion of time under the Speedy Trial Act until May 30, 2014.

23
24 April 18, 2014



HON. JON S. TIGAR
United States District Judge